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DOCKETS

2004 APR 13 A 11:50

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Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington DC 20590-001

Docket No. NHTSA-1998-4369 - 5

Dear Sir

In reviewing the proposed rule making for FMVSS 224, we offer the following comments.

We are in agreement with the proposal to exclude trailers equipped with tuckunder liftgates from the standard but feel the term "tuckunder" liftgates may cause some confusion. It further may not cover other liftgates that fall into the same category of interference with their operation if a guard is in place. The term "tuckunder" is a brand name used by some manufacturers of liftgates. They also go by the name "flipaway", "stowaway" etc. The term should either be changed to describe the type of liftgate being excluded or include the other brand names in the definition as other examples.

There are also other types of liftgates that have the same issue as the tuckunder that would have interference with a guard in operation. These gates fall into the category commonly called sliders and others called cantilever liftgates. The slider liftgates store much like the tuckunder gate in the description given in the proposed rule amendment. The difference is that it slides out horizontally before it can be used. Although the definition used would apply to a slider, the industry does not refer to them as tuckaways and this could lead to confusion that they may not be included in the exemption. The term slider should also be added to the definition.

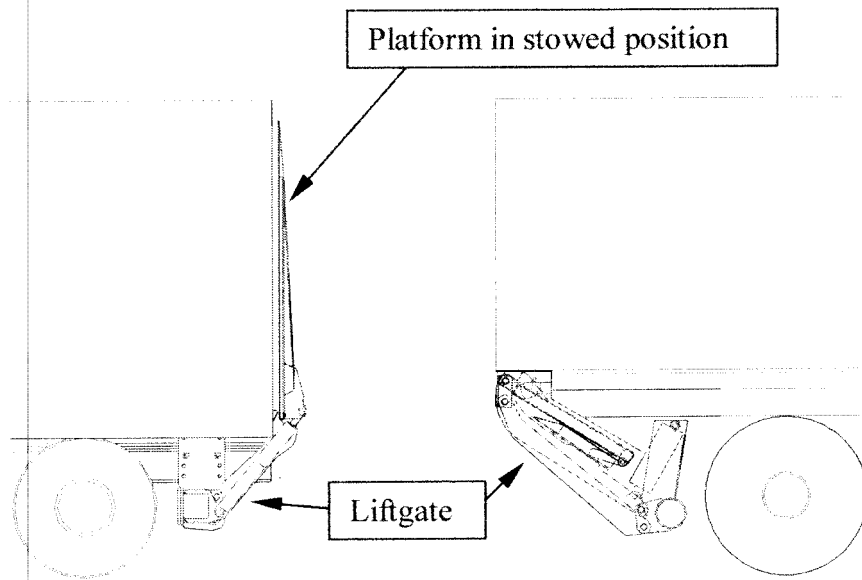
The last category of liftgates that creates a problem with the use of a guard, is the cantilever liftgates. They are mounted in the same way and occupy the same space as the tuckunder liftgate, with the exception that the loading platform does not reside under the trailer during transit. It stows against the rear of the trailer. The mounting structure of the liftgate is very similar to the tuckunder. The lifting mechanism that would interfere with a guard on a cantilever liftgate, would be nearly identical to that of the tuckunder. The portion of the tuckunder definition that states it must reside "completely" between the unaltered vehicle's rear most axle and rear extremity, needs to be rewritten to allow the loading platform to be stowed outside the defined area. The lifting and mounting mechanism of the liftgate still remains in that defined zone much like the tuckunder.

We have attached drawings of the three styles of liftgates in question to help clarify our position. If you have any questions please feel free to contact us at the number below.

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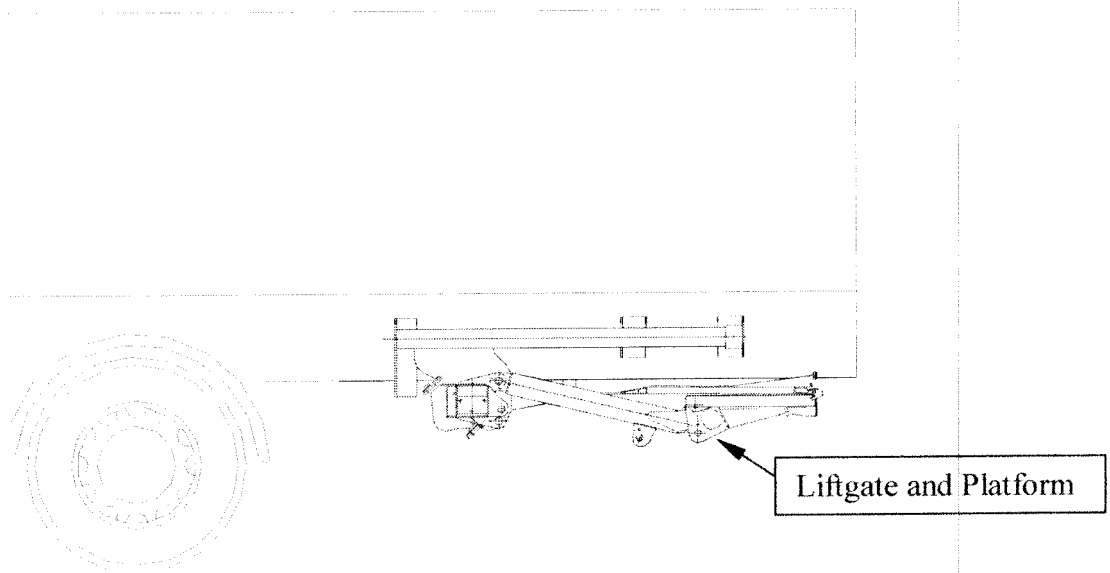
"WE'RE BEHIND YOU ALL THE WAY" IN LIFTGATE PERFORMANCE

Liftgate Categories



Cantilever Liftgate

Tuckunder Liftgate



Slider Liftgate

“WE’RE BEHIND YOU ALL THE WAY” IN LIFTGATE PERFORMANCE